

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSHUA ZHANG, Individually and on behalf of all :
other similarly situated, :
 :
Plaintiff, :
 :
v. : 22-cv-7966 (PKC) (CLP)
 :
GAOTU TECHEDU INC. F/K/A GSX TECHEDU :
INC., XIANGDONG CHEN, and NAN SHEN, :
 :
Defendants. :
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**NOTICE OF DEFENDANT GAOTU TECHEDU INC.'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated March 22, 2024, the accompanying Declaration of Robert A. Fumerton, dated March 22, 2024, and the exhibits thereto; and upon all prior papers and proceedings herein, Defendant Gaotu Tchedu Inc., through its undersigned counsel, will move this Court before the Honorable Pamela K. Chen, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, 11201, on a date and at a time designated by the Court for an Order dismissing the Amended Complaint (ECF No. 31) with prejudice pursuant to Federal Rules of Civil Procedure 8(a), 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4, and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the stipulation that was so ordered on January 23, 2024, the parties agreed to the following schedule: Lead Plaintiff shall file any opposition to this motion by May 21, 2024, and Defendant shall file any reply by June 20, 2024.

Dated: New York, New York
March 22, 2024

Respectfully submitted,

/s/ Robert A. Fumerton
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